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Service of papers will not be accepted via fax and/or e-mail.

FREDERICK P. ALTMAN (1928-1997)
JOSEPH A. ALTMAN*
*MEMBER NEW YORK, NEW JERSEY & FLORIDA BAR

June 12, 2020

Hon. Magistrate Judge Debra C. Freeman
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312
VIA ECF

If Plaintiff has still failed to move, reply,
or otherwise respond to Defendant's
counterclaim by 6/19/2020, then
Defendant may proceed to seek entry of
default and move for a default judgment
on the counterclaim.

Dated: 6/15/2020
SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

RE: Candido Tepox Munive v. Furniture Direct Outlet Inc./Rami Alquran
19-CV-9576 -- LETTER/MOTION

Dear Hon. Magistrate Judge Debra Freeman:

As the attorney for the Defendants, we hereby request that the Court enforce its April 23, 2020 Court Order, which ordered that the "Plaintiff shall move, reply, or otherwise respond to the Defendant's Counterclaim, no later than May 25, 2020."

That during our April 23, 2020 conference, the Court questioned why the Plaintiff did not interpose a Reply to the Defendants' Counterclaim, with the Plaintiff's response being that the Plaintiff was awaiting the results of the mediation, wherein the extension to Reply, by May 25, 2020 was granted on consent.

As this point, since the Plaintiff has not interposed a Reply, or otherwise complied with the Court's April 23, 2020 Order, then pursuant to Rule 55, the Plaintiff is in default. Hence, the Defendants hereby respectfully request an Order confirming the Plaintiff's Default, with the Defendants to proceed to inquest, on a date and time certain, as set by the Court.

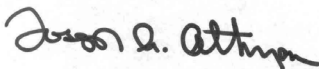
That I am annexing the following exhibits:

Exhibit A Summons and Complaint
Exhibit B Verified Answer with Counterclaim
Exhibit C 4/23/20 Scheduling Order
Exhibit D Docket Print Out

If anything else is needed, then kindly advise.

Respectfully submitted,

Joseph A. Altman P.C.



BY: Joseph A. Altman, Esq.

JAA:ra

Cc: Helen F. Dalton & Assoc. P.C. via email